

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, *et al.*,

Defendants.

Civ. No. 1:16-cv-00563 (LO/TCB)

NOTICE OF PLAINTIFFS' MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Local Civil Rule 5, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”) are filing a Motion to File Documents Under Seal (“Motion”). In support of the Motion, Plaintiffs are filing a non-confidential Memorandum in Support of Plaintiffs’ Motion to File Documents Under Seal, along with this Notice and a Proposed Order.

This document serves as notice to the public that Plaintiffs, by counsel, have moved the Court to seal from public disclosure certain exhibits to Plaintiffs’ Oppositions to Defendants’ Motions in Limine, Dkts. 325, 328, 332, and 337. A brief description of the contents of the documents that Plaintiffs request to file under seal is as follows:

Plaintiffs’ Opposition to Defendants Motion to Exclude Evidence of the Ethnicity of Individuals at the Park Allegedly Affected, Dkt. 360:

- Exhibit 1: Summary of charts disclosing the names of Defendants’ tenants.

Plaintiffs' Opposition to Defendants Motion to Exclude the Testimony of Ivan Yacub, Dkt. 361:

- Exhibit 3: Communications between the parties related to Plaintiff's lease agreement which the Defendants have maintained as confidential.
- Exhibit 4: Communications to the Plaintiffs related to eviction, which the parties have maintained as confidential; as well as sensitive personal information including sensitive financial information about the Plaintiffs.
- Exhibit 5: Communications to Plaintiffs related to eviction which the parties have maintained as confidential.
- Exhibit 7: Defendant's designated confidential deposition.

Plaintiffs' Opposition to Defendants Motion to Exclude Evidence of Lease Materials and Purported Eviction Correspondence, Dkt. 362:

- Exhibit 2: Communications to Plaintiffs related to eviction which the parties have maintained as confidential.
- Exhibit 3: Commercial communication to tenants designated confidential by the agreement of counsel.
- Exhibit 5: Third-party correspondence relating to Defendants' business practices including sensitive business information which the parties have maintained as confidential.
- Exhibit 6: Rental agreement from landlord not party to this litigation, designated as confidential by agreement of counsel.
- Exhibit 7: Background check documents including Plaintiffs' sensitive personal information.

Plaintiffs' Opposition to Defendants Motion to Exclude Evidence Damages, Dkt. 363:

Exhibits 1-4: Plaintiffs' designated confidential depositions, which contain sensitive personal information.

Objections to this Motion to File Documents Under Seal should be filed in the Civil Section of the Clerk's Office of this Court. This Notice will be posted for a minimum of 48 hours.

Respectfully submitted,

Date: June 4, 2021

//s//

LEGAL AID JUSTICE CENTER
Simon Sandoval-Moshenberg, VSB #77110
simon@justice4all.org
Nady Peralta, VSB #91630
nady@justice4all.org
Granville Clayton Warner, VSB #24957
cwarner@justice4all.org
6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
Phone: (703) 778-3450
Fax: (703) 778-3454

QUINN EMANUEL URQUHART & SULLIVAN, LLP
Kaiyeu Kevin Chu, VSB #85746
kevinchu@quinnmanuel.com
Matthew Traupman (pro hac vice)
matthewtraupman@quinnmanuel.com
1300 I Street NW, Suite 900
Washington, District of Columbia 20005
Phone: (202) 538-8000
Fax: (202) 538-8100

Counsel for Plaintiffs

Certificate of Service

I hereby certify that on this 4th day of June, 2021, I caused the foregoing, along with all attachments thereto, to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing (NEF) to all counsel of record.

//s//

Simon Sandoval-Moshenberg (VSB No. 77110)
simon@justice4all.org
Legal Aid Justice Center
6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
Tel: (703) 720-5605
Fax: (703) 778-3454